



Permit # GMG 29 0000
Mmm 29 0000
16290 KATY FREEWAY
SUITE 600
HOUSTON, TEXAS 77094
TEL (281) 675-9000
<http://www.murphyoilcorp.com>

RECEIVED

13 MAR 28 PM 1:55

PERMITS BRANCH
6WQ-P

April 19, 2011

Mr. Isaac Chen
US EPA, Region 6 / NPDES Permits & TMDLs Branch
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Chen:

Pursuant to my discussion with Mr. Joe Smith (ExxonMobil / Offshore Operators Committee (OOC) representative) and on behalf of Murphy Exploration & Production Company - USA (Murphy), this letter is intended to supplement the comments on the prospective new General Permit provided to you by Mr. Smith. Murphy understands that EPA is considering the inclusion in the new General Permit of terms and conditions for Cooling Water Intake Structures that are essentially the same as those contained in the current General Permit GMG290000. Murphy would request that EPA Region 6 consider the following comments in developing the new General Permit. The following comments apply to the General Permit conditions as they apply to fixed platforms that do not use sea chests.

I. Need for Clarification of Visual Inspection or Remote Monitoring Device Requirement for Cooling Water Intake Structures

Section I.B.12.d on "New Fixed Facilities that do not employ sea chests as intake structures" provides:

1. Beginning two years after the effective date of this permit, the operator must conduct **either** visual inspections **or use remote monitoring devices** during the period the cooling water intake structure is in operation. The operator must conduct visual inspections at least weekly, or at a lesser frequency as approved by the director, to ensure that the required design and construction technologies are maintained and operated so they continue to function as designed. **Alternatively, the operator must inspect using remote monitoring devices to ensure that the impingement and entrainment technologies are functioning as designed.**

(emphasis added). The requirement to "inspect using remote monitoring devices" is clearly a distinct alternative to the requirement for "visual inspections." The use of either remotely operated vehicles (ROVs) or divers to inspect would involve a **visual** rather than a **remote device** inspection as contemplated in the General Permit.

060113
SW

Murphy believes that it can achieve effective compliance with the remote device monitoring and inspection alternative through the use, monitoring, and inspection of continuous pump data from cooling water system intake pumps and temperature data from the heat exchanger. Through the constant monitoring of these devices in the control room and the use of alarms at pre-set thresholds, blockages of the intake screens can quickly be detected. Murphy believes that it is appropriate to **supplement** the remote device monitoring and inspection with visual inspections (using divers or ROVs) when operational issues develop with the cooling water intake systems.

Murphy believes that it would be helpful for EPA to clarify that the use of visual inspections to supplement the use of other remote monitoring devices does not then require that the visual backup to the remote monitoring be performed weekly. Murphy would suggest the addition of a new sentence to clarify General Permit Section I.B.12.d.1. as follows:

1. Beginning two years after the effective date of this permit, the operator must conduct either visual inspections or use remote monitoring devices during the period the cooling water intake structure is in operation. The operator must conduct visual inspections at least weekly, or at a lesser frequency as approved by the director, to ensure that the required design and construction technologies are maintained and operated so they continue to function as designed. Alternatively, the operator must inspect using remote monitoring devices to ensure that the impingement and entrainment technologies are functioning as designed. Visual inspections may be used to supplement remote device monitoring and inspection but such visual inspections are not subject to the weekly monitoring schedule applicable to visual inspections used as the primary means of compliance with this Section I.B.12.d.1.

II. Need for Clarification on Application of Participating in Industry-Wide Study

The scope of the exemption from cooling water monitoring requirements is unclear in the current General Permit. Murphy would suggest the following clarification in the language of General Permit Section I.B.12.d.2:

Alternatively, operators may comply with all monitoring requirements of this section I.B.12.d through participation in an EPA approved industry-wide study. That study may include a smaller, statistically representative number of facilities. See also section B.12.a of this permit....

General Permit Comments

April 19, 2011

Page 3

The suggested language applies the industry-wide study alternative to all intake structure monitoring requirements found in § I.B.12.d. This revision would be consistent with the correspondence from EPA Region 6 to the OOC in 2008.¹

Thank you for your consideration of these issues. If you have any questions about the suggested language or comments, please contact Joanna Spires at 281-675-9171 or via email at joanna_spires@murphyoilcorp.com.

Sincerely,



Tammy S. Meador
HSE Manager
U.S. / GOM Operations

¹ See Letter from J. Scott Wilson, Acting Chief EPA Region 6, to Kent Satterlee, dated April 22, 2008, Attachment A; Letter from Claudia V. Hosch, Chief EPA Region 6, to Kent Satterlee, dated June 27, 2008, Attachment B.